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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - San Francisco Division

NICHOLLE VANNUCCI, ELLEN
BROWN and DEBORAH DRAKE,
individuals; and HOMELESS ACTION!,
an unincorporated
association,

Plaintiffs,

v.

COUNTY OF SONOMA, SONOMA
COUNTY COMMUNITY
DEVELOPMENT COMMISSION, CITY
OF SANTA ROSA, and DOES I to XX,

Defendants.

CASE NO. 3:18-CV-01955-VC

**DECLARATION OF SUE A.
GALLAGHER IN OPPOSITION
TO MOTION TO ENFORCE AND
CLARIFY PRELIMINARY
STIPULATED INJUNCTION**


Date: December 3, 2020
Time: 10:00 a.m.
Ctmm: 4, 17th Floor
Judge: The Hon. Vince Chhabria

I, Sue A. Gallagher, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and if called as a witness could and would competently testify thereto.

2. I am the City Attorney for the City of Santa Rosa. I am a member of and regularly attend the Homeless Action Team (HAT) and Homeless Encampment Assistance Program (HEAP) team meetings. I work closely with Rob Jackson, the Assistant City Attorney in our office tasked with defense of this lawsuit. I advise the Mayor and the City Council on the legal aspects of the City's efforts to address crisis of homelessness in Santa Rosa.

Executed on November 3, 2020, Santa Rosa, California.


SUE A. GALLAGHER